

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DEBRA INNACE,

Docket No.: 2:22-cv-3440

Plaintiff,

**NOTICE OF REMOVAL**

-against-

J.C. PENNEY CORPORATION, INC.,

Defendant.  
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Defendant, J.C. PENNEY CORPORATION, INC., files this Notice of Removal and request that removal be granted for the reasons set forth herein.

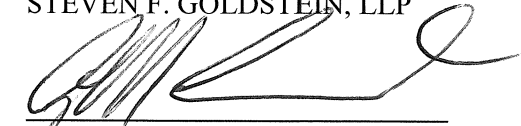
The defendant seeks removal pursuant 28 U.S.C. §1441(a). The matter sought to be removed now is pending in the Supreme Court of the State of New York, County of Kings. This Court would have original jurisdiction over this matter pursuant to 28 U.S.C. §1332. At the time of filing of the Complaint and at the time of filing this Notice of Removal: (1) Plaintiff was and is a resident and citizen of the State of New York, County of Queens; and (2) Defendant, J.C. PENNEY CORPORATION, INC., is a Foreign Corporation with its headquarters in the State of Texas, County of Collin. According to the allegations in the plaintiff's Complaint, it appears that the amount of controversy exceeds the sum of \$75,000.00, exclusive of interests and costs. Defendant received a copy of the Summons and Complaint on or about June 6, 2022.

Copies of all papers received by the defendant in the State Court action are annexed hereto as **Exhibit "A"**.

Dated: Carle Place, New York  
June 10, 2022

Yours, etc.

STEVEN F. GOLDSTEIN, LLP



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